

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ILA LaFRENTZ, JIM LaFRENTZ, §  
KATHERINE PORTERFIELD, and §  
WILLIAM LaFRENTZ, Individually §  
and as Representative of the Estate §  
of JAMES B. LaFRENTZ §  
§  
vs. § CIVIL ACTION NO. 4:18-cv-04229  
§ JURY DEMANDED  
§  
3M COMPANY, ET AL §

**DEFENDANT 3M COMPANY'S MOTION FOR SUMMARY JUDGMENT**

Defendant 3M Company moves the court to enter summary judgment in its favor pursuant to Federal Rule of Civil Procedure 56. As discussed in its supporting memorandum, which is incorporated by reference, 3M is entitled to summary judgment for three independent reasons, and under Texas law, no question of material fact exists as to any.

Respectfully submitted this 1<sup>st</sup> day of July, 2021.

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**COUNSEL FOR DEFENDANT**

**3M COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of July, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and I hereby certify that I have thereby electronically served this document upon all counsel of record who are registered with the Court's CM/ECF system.

*/s/ Michele E. Taylor*  
Michele E. Taylor